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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Cheryl Sagataw, DeAnthony  
Barnes, Roberta Strong, and  
Travis Neloms, *on behalf of*  
*themselves and a class of similarly*  
*situated individuals,*

Ct. File No. 24-cv-00001(ECF/TNL)

Plaintiffs,

DECLARATION OF BARB  
MELLEN

v.

Mayor Jacob Frey, *in his individual and*  
*official capacity.*

Defendant.

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Your Declarant is Barb Mellen, and she submits the following declaration:

1. I own and live in a home that is a half block from the Nenookaasi encampment when it was located at 26<sup>th</sup> Street and 14<sup>th</sup> Avenue South.
2. The Nenookaasi encampment existed at this location from approximately January 4, 2024 until it was closed on January 30, 2024. During this time, the encampment had a significant negative impact on my life.
3. The encampment typically had many fires burning at any given point. This generated an incredible amount of smoke in the neighborhood.

4. The smoke not only hung over the neighborhood, but it also permeated the nearby houses. At one point, the smell of smoke was so strong in my house that I thought my house might be on fire.
5. I am 68 years old, and my husband is 72. We both suffer from asthma. The smoke from the encampment that permeated our house caused my husband and I to have significant health issues. We often had trouble breathing due to the smoke in the air.
6. During the time that the Nenookaasi encampment was located at 26<sup>th</sup> Street and 14<sup>th</sup> Avenue South, both my husband and I had to take additional medications to deal with our respiratory health issues caused by the smoke from the encampment.
7. At one point, I had to go to urgent care because the smoke in the air was impacting my ability to breath. My husband also had to go to urgent care for the same reason. The urgent care visits were expensive.
8. During the time that the Nenookaasi encampment was located at 26<sup>th</sup> Street and 14<sup>th</sup> Avenue South, I had to purchase two air filters to place in my home to combat the smoke from the encampment.
9. During the time that the Nenookaasi encampment was located at 26<sup>th</sup> Street and 14<sup>th</sup> Avenue South, I found used hypodermic needles and drug paraphernalia in my yard.

10. During the time that the Nenookaasi encampment was located at 26<sup>th</sup>

Street and 14<sup>th</sup> Avenue South, I found human feces in my yard.

11. During the time that the Nenookaasi encampment was located at 26<sup>th</sup>

Street and 14<sup>th</sup> Avenue South, on multiple occasions I found used, soiled

bed sheets or clothes from the encampment discarded on my property.

12. During the time that the Nenookaasi encampment was located at 26<sup>th</sup>

Street and 14<sup>th</sup> Avenue South, I was often fearful for my personal safety. I

was forced to change my personal habits out of fear for my safety. I

stopped leaving my house after dark. I often avoided certain entrances to

our alley in order to stay away from groups of individuals from the

encampment that would congregate there.

13. I declare under penalty of perjury that everything I have stated in this

declaration is true and correct. Signed in Hennepin County, Minnesota.

Dated: 2/29/24

/s Barb Mellen  
Barb Mellen